

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking into Policies to
Promote a Partnership Framework between Energy
Investor Owned Utilities and the Water Sector to
Promote Water-Energy Nexus Programs.

Rulemaking 13-12-011
(Filed December 19, 2013)

**REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) ON
ASSIGNED COMMISSIONER'S RULING ENTERING WORKSHOP REPORT INTO
THE RECORD AND SEEKING COMMENT
DATED OCTOBER 19, 2016**

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October 31, 2016

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On October 19, 2016, Commissioner Sandoval issued a Ruling, *Assigned Commissioner’s Ruling Entering Workshop Report into the Record and Seeking Comment*, to solicit comment on a report and the themes arising from the proceeding. San Diego Gas & Electric Company (“SDG&E”) received comments from the Consumer Federation of California, AT&T and Green Power Institute. SDG&E respectfully submits comments in response to the filing of AT&T.

The Opening Comments of AT&T respond to three questions. SDG&E responds to those same questions as discussed below:

Questions: Should water, energy and telecommunications utilities be required to have disaster management plans to protect ratepayers investment in water and energy facilities? Should these plans be filed with the Commission?

Response: The California Public Utilities Commission (“CPUC”) General Order No. 166, *Standards for Operation, Reliability, and Safety During Emergencies and Disasters*, applies to all electric utilities subject to the jurisdiction of the CPUC with regard to matters

relating to electric service reliability and/or safety. The General Order states that the purpose of the standards

“...is to insure that jurisdictional electric utilities are prepared for emergencies and disasters in order to minimize damage and inconvenience to the public which may occur as a result of electric system failures, major outages, or hazards posed by damage to electric distribution facilities. The standards will facilitate the Commission’s investigations into the reasonableness of the utility’s response to emergencies and major outages. Such investigations will be conducted following every major outage, pursuant to and consistent with Public Utilities Code Section 364(c) and Commission policy.” (at page 1)

General Order 166 further itemizes numerous rules by which a jurisdictional electrical utility must comply. The rules include but are not limited to:

- Preparation of an emergency response plan with updates prepared annually. The plan shall recognize the need to communicate mutual assistance activities with the State Office of Emergency Services, through the UOC/OES Branch, during an emergency. Plan updates are to be submitted as part of the annual report required by Standard 11 of the General Order.
- Notifying relevant individuals and agencies of an emergency or major outage in a timely manner.
- Coordinating emergency plans with state and local public safety agencies.
- Plan shall recognize the need to communicate mutual assistance activities with the State Office of Emergency Services, through the UOC/OES Branch, during an emergency.

Given the existence of General Order 166, electrical utilities under the jurisdiction of the CPUC already have in place plans, as envisioned by the CPUC, to address emergencies and disasters in order to minimize damage and inconvenience to the public resulting from electric system failures, major outages or hazards posed by damage to electric distribution facilities. SDG&E suggests that the CPUC in its deliberations on this issue avail itself to General Order

No. 166 to gain greater familiarity with the extensive nature of the requirements that electric utilities are currently required to comply with, to avoid duplication and to minimize the potential drain on resources at both the utility and CPUC.

Question: Should the Commission direct water, energy, and telecommunications utilities and respondents to invest in technologies such as MIMO mesh networks, drone-based communications, or other methods, to quickly deploy emergency communications networks that link public safety ground personnel with each other and with properly equipped aircrews, while not interfering with aviation or public safety personnel during fire and other emergencies?

Response: AT&T in its comments discusses the reasons that the CPUC should not attempt to direct by regulatory order the use of specific technologies in certain situations.

SDG&E agrees with AT&T's comments and for ease of reference includes them herein:

“The Commission should not attempt to direct by regulatory fiat the use of specific technologies in certain situations. First, identifying the appropriate technology is significantly dependent upon the specific circumstances. It is unlikely that any regulatory body could foresee all the possible permutations of circumstances and accurately dictate the appropriate technology application for each. Moreover, communications technology, like other technology, evolves extremely rapidly. Thus, even if it were possible to identify the “right” technology for each situation, it is highly unlikely that the specific technology use mandated by an agency would remain the most efficient and effective approach for any meaningful length of time.....”

In conclusion, SDG&E appreciates the opportunity to provide these reply comments.

Respectfully submitted,

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